



## CITY OF ATLANTA

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ANDRE DICKENS  
MAYOR

December 14, 2022

To: Georgia Power Public Service Commission  
244 Washington Street  
Atlanta, GA 30334  
Cc: Chris Womack  
CEO, Georgia Power  
241 Ralph McGill Blvd NE  
Atlanta, GA 30308

Dear Public Service Commissioners,

For the first time in history, a coalition of local governments joined forces to intervene in the 2022 Integrated Resource Plan (IRP) and Rate Case proceedings. The City of Atlanta has been proud to partner with Athens-Clarke County, the City of Savannah, Dekalb County, and the City of Decatur. As this opportunity only occurs every three years, the results of these decisions will impact my constituents far beyond the 20-year plan horizon. Therefore, I believe it is imperative that I am on the record in support of this precedent setting engagement and to underscore my commitment to advancing Atlanta's clean energy goal – 100% clean energy for 100% of the people.

When I took office, I set a progressive agenda focused on opportunity, safety, and investment for the future – for everyone. A City Built for the Future, a key pillar of my agenda, is about creating a strong, healthy, and sustainable city that supports our growth and promotes equity. The decisions made by this commission activate investments that have broad impact across Georgia – from catalyzing Georgia's economy through clean energy and climate resilient infrastructure, to economic development that provides pathways to prosperity for all. While we as local governments can set priorities related to clean energy, climate action and environmental justice, we depend on the Public Service Commission to pull the regulatory levers necessary to implement these goals. As commissioners, you have the authority to advance equity in utility regulation by addressing energy affordability through better rate structures, procuring more renewable energy resources, increasing investments in energy efficiency, requiring data transparency, and limiting rate shocks that fall disproportionately on our most energy burdened residents.

I also want to amplify my appreciation for the existing partnerships that we have with Georgia Power. Their willingness to support causes beyond their core business, supports my agenda as mayor. Further, the economic development opportunities they drive provide unparalleled benefits to both the City of Atlanta and the great State of Georgia. The benefits of these collaborations are demonstrated through partnerships like our “Light Up the Night” Initiative, with a goal to install 10,000 lights throughout the City of Atlanta. Georgia Power and our Atlanta Department of Transportation have made great headway on improving public safety while also reducing our energy consumption. We are on track to exceed that goal and by year end, we anticipate completing 4,500 LED conversions. Also, programs like EV Make Ready provide essential funding to expand our electric vehicle infrastructure. This includes the recently approved EV Make Ready funding to support 32 additional EV Stations at the Hartsfield Jackson Atlanta International Airport.

The success of these collaborations has laid the groundwork needed to address the critical priorities addressed by our coalition throughout this proceeding. However, we can, and must go further together with this commission directing Georgia Power to -

- **Monthly Netting:** Remove the cap on monthly netting and do not allow the addition of a fee on residential rooftop solar systems. This supports equitable access to the economic and health benefits of rooftop solar while also promoting new business opportunities.
  1. If the Commission decides to move forward with the settlement language, Commissioners should consider Georgia Power pay an additional amount of no less than 6 cents per kWh for excess generation and initiate a non-litigated stakeholder process to develop a true long-term solution ahead of the 2025 rate case.
- **Community Solar:** Design an affordable community solar program that removes premium price barriers and provides equitable access to clean energy. Particularly for those who do not own their building or have the ability to benefit from rooftop solar.
  1. Specifically, I recommend the PSC to adopt the PIA Staff’s proposed community solar subscription price of \$20/kW for residential customers and \$22/kW for commercial customers.
- **Income Qualified Discount:** Expand the Income Qualified Senior Citizen Discount to all income qualified customers. This addresses the rising costs of energy that is driving displacement and impacting housing affordability.
- **Data Access:** Data is vital for municipal customers, like City of Atlanta buildings, to pursue energy efficiency, develop solar projects and accurately forecast and measure progress towards our clean energy goals. Access to accurate and regularly updated data is also essential for rate selection and corresponding best energy use behaviors. With these data, we can work with Georgia Power to ensure we are setting clean energy goals that are grounded in fact.

1. Order Georgia Power to reprogram and/or replace meters as necessary to ensure all residential and commercial accounts with AMI meters can access hourly usage data as contemplated in the commission's March 18, 2021 order.
- **Fixed Price Alternative Rate:** The City of Atlanta identified the Fixed Price Alternative Rate for multiple Department of Watershed Management Buildings as a part of our Solar Atlanta program and stand to save \$4+ million on the savings from the rate switch over the contract term. Unfortunately, the company is no longer offering this rate to interested commercial customers who would stand to save money by switching to this rate
    1. Require the Company to offer the Fixed Pricing Alternative (FPA) tariff to eligible customers at all times. The Company currently has discretion in offering the Fixed Price Alternative (FPA) tariff to customers who would like to leave Real Time Pricing (RTP) for a more predictable tariff. The Coalition largely agrees with the Staff but further requests that the FPA be offered to all eligible customers at any time, unless the Commission orders otherwise.
  - **EV Make Ready:** Approve the Company's Request for the full \$81 million for the EV Make Ready Program to support clean electric vehicle infrastructure for our expanding city EV fleet and meet the needs of our rapidly expanding community EV adoption.

As a mayor and a Georgia Tech educated engineer, I understand the significant impacts that your decisions on this Rate Case will have on my city's budget, our 100% clean energy goals, and the household economic stability of Atlanta's 532,000 residents. We need continued engagement with an intentional direction from this commission to meet our ambitious, and achievable, clean energy goals.

I urge this commission to seize this opportunity to demonstrate how public private partnerships supported by equity in utility regulation can advance economic mobility, increase housing affordability, and mitigate the disproportionate impacts of climate change while growing an equitable, clean energy future that moves Atlanta, and Georgia, forward together.

In Service,



Andre Dickens  
Mayor